

# EXHIBIT A-1

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

RECEIVED  
OCT 26 2020  
PRIME CLERK LLC

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

as representative of

THE COMMONWEALTH OF PUERTO  
RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth, HTA, and ERS.**

**CLAIMANT RESPONSE TO TWO HUNDRED FORTY-SIXTH OMNIBUS  
OBJECTION**

**Instructions**

1. You should fill out and file this response form only if your claim relates to current or former employment with the government of Puerto Rico, or if your claim relates to a pending or closed legal action. If your claim does not arise from current or former employment with the Government of Puerto Rico, or if your claim does not relate to a pending or closed legal action, your response must be filed in accordance with the procedures detailed in pages 3-4 of the Notice accompanying the Two Hundred Forty-Sixth Omnibus Objection.

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. Please file a separate response form for each proof of claim to which the Debtors have objected. Do not file a single response form addressing more than one claim.
3. Please answer all questions and any applicable sub-questions.
4. Please include as much detail as possible in your responses.
  - a. **Your answers should provide more information than the initial proof of claim.** For example, if you previously wrote as the basis for your claim “Act 96,” please elaborate as to the specific laws on which you are purporting to rely, the year the law at issue was enacted, and how and why you believe such particular law provides a basis for your claim.
  - b. If available and applicable to your claim, please provide:
    - Copy of a pleading, such as a Complaint or an Answer;
    - Any unpaid judgment or settlement agreement;
    - Written notice of intent to file a claim with proof of mailing; and
    - Any and all documentation you believe supports your claim.
5. If you do not have a copy of your claim, you may download a copy by visiting Prime Clerk’s website at: <https://cases.primeclerk.com/puertorico/Home-ClaimInfo>.
6. You must sign your response where indicated below. If you do not sign your response, the clerk will not accept it for filing.
7. Please file the completed form and any supporting documents as directed in the Notice accompanying the Omnibus Objection to your claim.

### Questionnaire

1. Please provide a name, address, telephone number, and email address of either (1) the responding claimant; (2) the claimant’s attorney or designated representative to whom the attorneys for the Commonwealth, HTA, or ERS should serve a reply to the response, if any; or (3) the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the claimant’s behalf.

☐ **Name:** Pedro A. Miró Sotomayor

☐ **Address:** 2201 Carr. 14 – Alborada, Apt. 11501 – Coto Laurel, PR 00780-232

☐ **Telephone Number:** 787-317-7581

☐ E-mail Address: pedromiro2007@yahoo.com

2. Your Proof of Claim number: 11287

3. The Debtors have objected to your Proof of Claim because it does not provide sufficient information for the Debtors to understand the basis for your claim. Please check the box to which your Proof of Claim relates and explain the reason why you oppose the objection by explaining the basis for your claim. Attach additional pages if needed.

☐ A pending or closed legal action with or against the Government of Puerto Rico

☐ Current or former employment with the Government of Puerto Rico

N/A

Please attach a copy of any other documentation or other evidence in support of your claim.

4. What is the amount of your claim (how much money do you claim to be owed):

250,000

5. **Employment.** Does your claim relate to current or former employment with the Government of Puerto Rico?

☐ ☒ No. Please continue to Question 6.

☐ Yes. Answer Questions 5(a)-(d).

5(a). Identify the specific agency or department where you were or are employed:

\_\_\_\_\_

5(b). Identify the dates of your employment related to your claim:

\_\_\_\_\_

5(c). Last four digits of your social security number: \_\_\_\_\_

5(d). What is the nature of your employment claims? (select all that apply):

- ☐ Retirement
- ☐ Unpaid Wages
- ☐ Sick Days
- ☐ Union Grievance

- ☐ Vacation
  - ☐ Other (Provide as much detail as possible. Attach additional pages if necessary).
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**6. Legal Action. Does your claim relate to a pending or closed legal action?**

- ☐ No.
- ☒ **Yes.** Answer Questions 6(a)-(f).

6(a). Identify the department or agency that is a party to the action.

COFINA

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6(b). Identify the name and address of the court or agency where the action is pending:

COFINA

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6(c). Case number: \_\_\_\_\_

6(d). Title, Caption, or Name of Case:

6(e). Status of the case (pending, on appeal, or concluded): Pending

6(f). Do you have an unpaid judgment? Yes / No (Circle one)

If yes, what is the date and amount of the judgment?

\_\_\_\_\_

**PLEASE SIGN YOUR RESPONSE BELOW**

/Illegible signature/  
**Signature**

Pedro A. Miró Sotomayor  
**Printed Name**

October 13, 2020  
**Signature**

/Pages 5 to 31 are entirely in English. Please refer to original/

Response:

October 13, 2020

1-

To whom it may concern:

Response with my claim for losses related to the investment made when buying Puerto Rico Bonds from Banco Santander by using the Cofina Law. These bonds were purchased after accepting an offer by Banco Santander. These [bonds] were to have a higher interest than that paid by non-investment banks. ~~Those the interest~~ The interests were to be exempt and the money was to be protected since the government had to pay before other debts.

This is how the proposal was presented. It was a logical way to get money for retirement at the right time. But then everything collapsed and the only thing that came was a fall in the value of the bonds, the interest was affected. The bank got rid of its portfolio and the bonds were transferred to Mellon Bank. To avoid losing it all, I sold the bonds at an extremely low price, so as to avoid losing it all. While these bonds were at [...]

[...] Melon Bank, I don't recall receiving any interest payments.

When investment was at its peak, I remember having reached a total of \$540,000 in earnings. That happened in 2013. Then the aforementioned losses and frustration came.

I would like to clarify that I have no claims against the Retirement System of Puerto Rico; only COFINA.

My wife, Natividad García Miró, also suffered the same fate as me with her personal investments.

I am sending some documents that I have left after the large earthquake that the southern area suffered in January 2020.

I am also including documents for my wife, Natividad García Miró.

- CUSIP – 33611N101 } Natividad García  
33612G105 }
- CUSIP - 33611M-103 – Pedro Miró

/Illegible signature/



/Pages 34 to 44 are entirely in English. Please refer to original/

2013

→ Santander: \$538,880.22 - May 2 /cutoff/  
\$540,000 - June 213  
2013

- Pedro A. Miró – Account No. 7CC 160931

CUSIP – ~~336 128 103~~ 33611 M 103

- Natividad García Miró

CUSIP – 33611N101  
33612G105

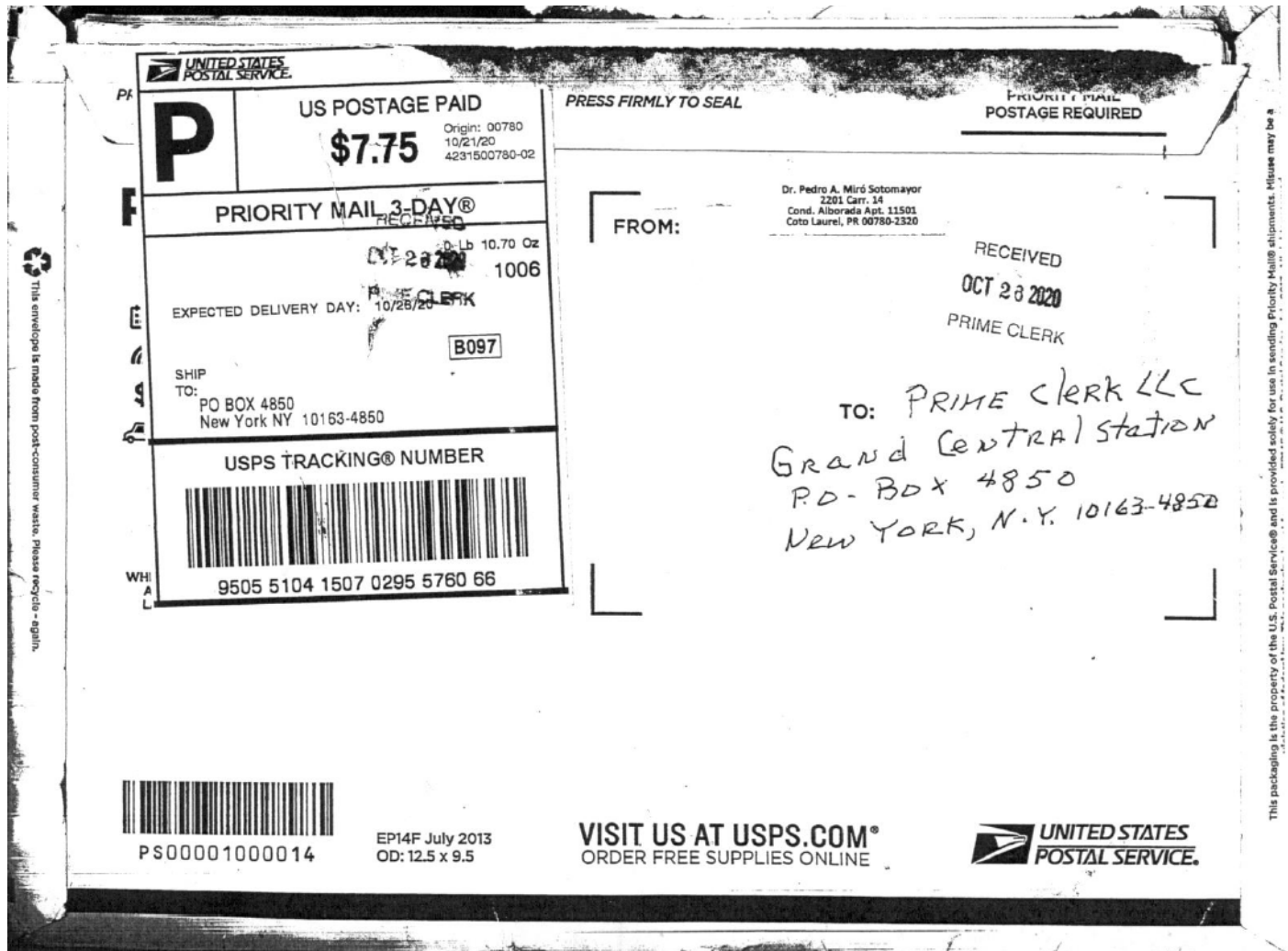
Federal Identification – 132741729

Pedro A. Miró + Natividad García

CUSIP - 33612103

Mr. Juan Rodríguez

+1 347 817-4158 - NY



Pedro A. Miró Sotomayor

Bancon Santander Securities

COFINA Bonds

Account: 7CC-160931



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### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)  
TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: Claim No. 11287 – ECF No. 14218 – Mailing Response (1)

Signed this 21<sup>st</sup> day of December 2020



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

A handwritten signature in black ink, appearing to read 'Andreea I. Boscor', written over a horizontal line.

Andreea I. Boscor

